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February 4, 2022

In re Google Digital Advertising Antitrust Litigation, No. 1:21-md-03010 (PKC)
State of Texas, et al. v. Google, LLC, No. 1:21-cv-06841 (PKC)

Dear Judge Castel:

We represent Facebook, Inc.¹ (“Facebook”) in the above-captioned multidistrict litigation. We write in support of Google LLC’s Motion to Seal Limited Personal Information in Exhibit A (Dkt. No. 219) in the *State of Texas, et al. v. Google, LLC* action, in which Facebook is not a party. In accordance with Rule 1.A of the Court’s Individual Practices, we note that no upcoming conferences are currently scheduled in this matter.

In its motion, Google LLC (“Google”) sought to seal the limited personal information regarding the employees referenced in Exhibit A to the Declaration of Andrew J. Ewalt. (Dkt. No. 219.) Exhibit A includes personal information about employees of both Google and Facebook. (Dkt. No. 221-1.) With respect to the Facebook employees, Facebook submits that these limited redactions are consistent with the Second Circuit standard in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 120 (2d Cir. 2006) for the reasons set forth in Facebook’s previous submissions (Dkt. Nos. 150, 184, 188), and are also consistent with the Court’s previous orders on this topic (Dkt. Nos. 151, 186, 189). Facebook therefore respectfully submits that the personal information regarding Facebook employees in Exhibit A remain under seal, consistent with Google’s proposed redactions. (Dkt. No. 221-1.)

¹ Facebook, Inc. changed its name to Meta Platforms, Inc. effective October 28, 2021.

Respectfully submitted,

/s/ Kevin J. Orsini

Kevin J. Orsini

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

cc: All Counsel of Record (via CM/ECF)